Response to August 29, 2013 Information Request from U.S. Environmental Agency ("EPA") for Super Salvage, Inc.

Provided below are the responses to Questions 4 through 28 of the August 29, 2013 Information Request issued by the U.S. Environmental Protection Agency ("EPA") to Super Salvage, Inc. ("SSI"). These responses supplement the responses to Questions 1 through 3 that were previously submitted to the EPA on September 25, 2013. All responses provided below have been prepared by Compliance Plus Services, Inc. ("CPS") on behalf of SSI based on information supplied directly by Mr. Robert Bullock, CFO unless specifically referenced otherwise. Additionally, the responses pertain only to the 5 year time period from May 2008 to May 2013 as specified in the Information Request.

For the sake of clarity, the responses provided herein restate the questions cited in the aforementioned Information Request. The EPA's questions are indicated in **bold** text with the responses immediately following in *italicized* text.

Questions Pertaining to the Clean Water Act:

4. **Does the Facility have a National Pollutant Discharge Elimination System (NPDES) Permit? If yes, please provide a copy of the permit, along with the following:**

    a. **The Facility's Notice of Intent submitted under EPA's 2008 Multi-Sector General Permit,**
    b. **The Facility's Stormwater Pollution Prevention Plan (SWPPP).**

    Response: The facility does not currently have an active NPDES permit. However a search of the EPA's Enforcement & Compliance History Online database indicates that an NPDES permit number #DCU000035 exists for the facility and that an EPA inspection/evaluation was conducted in February 2000. A copy of the database search results is attached as Exhibit E.

    It should be noted that a containment berm, as a Best Management Practice (BMP) recommended by the US EPA during their last inspection was built in 2000. Its construction is sufficiently high enough to prevent stormwater from leaving the facility, consequently, no Stormwater Pollution Prevention Plan (SPPP) was ever implemented.

    Never the less, a SPPP is currently being developed by Compliance Plus Services for the facility and SSI is in the process of filing a Notice of Intent (NOI) to apply for coverage under the EPA's Multi-sector General Permit. The NOI is also being completed by CPS.

5. **Provide a description of the nature of all activities at the Facility, including industrial activities (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams).**

Response: The facility purchases scrap metal which is segregated into ferrous (cast iron, structural steel, #1 steel, #2 steel) and non-ferrous (copper, aluminum, brass, lead, stainless steel). The segregated metal is then processed as follows:

- *Cast iron is mechanically broken down to sizes specified by the customer.*
- *Structural steel is generally hand cut using a torch into 2 or 5 foot lengths. It is also occasionally cut down using an electric powered, 800 ton Harris shear.*
- *#1 and #2 steel is cut by shear and compacted into specified sizes and densities.*
- *Non-ferrous metals are segregated further into categories of copper, aluminum, brass and lead. The material is then processed using 4 small, electric powered, alligator shears. Stainless steel and aluminum is bailed using a bailing machine.*

Ferrous metals are moved around the facility using 3 diesel powered cranes which are fueled daily from onsite tanks. The hydraulic fluid and crank case oils are checked daily and added as needed. Oil is changed after 500 hours of use. The bailer is loaded using a diesel powered, bobcat which is fueled as needed from onsite tanks. It's oil is changed after 500 hours of use. Segregated containers of non-ferrous metals are moved using two propane powered, forklifts. Propane and oil are checked daily and added as needed.

The bailer, Harris shear, and alligator shears are located inside. The forklifts and bobcat are stored inside when not in use. All cranes are located outside at all times.

Metal is generally not stored at the facility other than to accumulate enough metal to complete a truck load. The facility also accepts sealed batteries for consolidation on to pallets and shipping offsite for recycling.

Trucks with incoming material enter the facility through the entrance on the northeast corner of the site (Potomac Ave and 1st Street) and are directed to the scale for weighing. Once weighed the truck is directed to 1 of 4 locations of the facility depending on the type of metal. Non-ferrous metal is unloaded manually. Ferrous metal is dumped or unloaded using a crane with a grappler. Cast iron is unloaded using a crane with a magnet. The empty truck is then reweighed and the weight of metal removed is priced accordingly.

Outgoing material is loaded onto empty trucks that have been previously weighed, using a crane with a grappler or magnet. The filled truck is reweighed and an invoice is prepared based on the weight of metal. Truck loads are verified to be under highway weight limits and are visually inspected prior to being tarped and leaving the facility.

6. **Provide a site map for the entire Facility, which includes, but is not limited to, the following:**

   a. **The size of the property in acres;**
   b. **The location and extent of significant structures and impervious surfaces;**
   c. **Directions of stormwater flow (use arrows);**
   d. **Locations of all existing structural control measures – Best Management Practices (BMPs);**

e. Locations of all stormwater conveyances including ponds, ditches, pipes, and swales;
f. Locations of significant spills or identified leaks that have occurred;
g. Locations of all stormwater monitoring points;
h. Locations of stormwater inlets and outfalls, with a unique identification code for each outfall (e.g., Outfall No. 1, No. 2, etc.), and an approximate outline of the areas draining to each outfall;
i. Municipal separate storm sewer systems, where your stormwater discharges to them; and
j. Locations and descriptions of all non-stormwater discharges.

Response: A site map for the entire facility with the requested information has been attached as Exhibit F. As noted on the site map:

a. The size of the property is 0.95 acres
b. The location and extent of significant structures and impervious services are clearly marked.
c. The direction of stormwater flow is towards the depression area.
d. The locations of the berm and stormwater retention pond, both BMPs, are clearly marked.
e. The location of the retention pond is clearly marked.
f. No significant spills or leaks are known.
g. There are no stormwater monitoring points.
h. There are no stormwater outfalls.
i. Stormwater does not discharge to a municipal storm sewer system. The only stormwater run-off that leaves the site is from the roof drains at the south end of the site onto "S" Street SW.
j. There are no non-stormwater discharges.

7. Provide all facility Stormwater self-inspection reports as well as any inspection reports generated by a third party.

Response: The active portion of the facility is designed to retain stormwater which is pumped to the stormwater retention pond. Visual inspections are periodically performed by facility personnel after rain events, however, there are currently no Stormwater self-inspection reports for the site. In addition, to the best of the knowledge of the facility personnel, no specific stormwater inspection reports have been generated by a third party.

8. Provide the as-built drawings for the Facility, including post construction Best Management Practices (BMPs) and any design drawings for the discharge of the stormwater at the Facility. Include on these drawings any connections to the District of Columbia Municipal Separate Storm Sewer System (MS4), the Blue Plains wastewater treatment facility, or directly to the Anacostia River, or any other surface water.

Response: There are currently no as-built drawings available for the facility. Mr Bullock consulted with Joel Kaplan (employed from 1970-1998) and Paul Kaplan (employed from 1965-2005), sons of the former owner (deceased), and was unable to locate any as-built drawings or determine if any as-built drawings ever existed. To the best of his knowledge, Mr Bullock, is not aware of any post construction Best Management Practices or design drawings for the discharge of stormwater.

Mr Bullock also has no knowledge of any stormwater discharges connected to the DC MS4, the Blue Plains wastewater treatment facility, or Anacostia River.

9. **Describe the process by which any stormwater/fluid is collected and discharged from the depression area located in the center of the Facility (i.e., whether fluid is always pumped to the stormwater pond, or sometimes removed/dispersed by some other means).**

Response: All stormwater collected in the depression area is pumped exclusively to the stormwater pond using a manually operated pump.

10. **With regard to the stormwater pond, a BMP, provide the following narrative responses or documentation, as appropriate:**
    a. **Is the stormwater pond used for collecting any other types of liquids besides stormwater (i.e. stormwater comingled with non-process or process wastewater, oil, grease, etc.)? Identify all fluids other than stormwater that are drained or pumped into the stormwater pond.**
    b. **Identify what happens to any and all liquids in the stormwater pond (i.e. groundwater recharge, direct discharge to surface water, discharge to MS4, pump-and-haul, etc.).**
    c. **Where does the riser structure located in the stormwater pond discharge?**
    d. **Identify any maintenance performed on the stormwater pond, including the riser located in the pond. Maintenance includes, but is not limited to, visual inspections of the pond and the riser, pumping and hauling, the addition of chemicals, skimming oil, or integrity tests of the riser. Does the Facility have maintenance logs? If so, provide logs and as many details as possible of the maintenance that took place.**
    e. **Identify any sampling conducted on the contents of stormwater pond. Provide all records of the outcome of any monitoring performed in connection with the stormwater pond in the last five years, including monitoring of the liquid and the sediment in the pond.**
    f. **Identify any spill minimization, prevention, and elimination activities. Include a description of the spill, including cause, and describe all BMPs used to rectify such spills. Identify any areas that were affected by such spills, including a description of any type of contamination clean-up as a result of a spill.**

Response:

a. *The stormwater retention pond is not used for collecting any liquid other than stormwater. There are no process , or non -process wastewaters that comingle with the stormwater.*
b. *The water in the stormwater retention pond is subject to groundwater recharge, evaporation and periodic skimming by third party contractors for offsite disposal.*
c. *The location of the discharge of the stormwater pond riser structure is currently unknown. It is believed that it was installed by the previous property owner to keep stormwater from flooding this area of the facility, however, there is no evidence to substantiate this speculation. No one at SSI has ever witnessed the riser pipe take on any water.*
d. *The stormwater retention pond and riser are visually inspected following significant rain events. The pond is occasionally vacuumed out and the water is disposed of by a subcontracted waste hauler. There is no addition of chemicals, or integrity testing of the riser. The facility does not keep maintenance logs for any activities associated with the pond or riser, however, service invoices for vacuuming and offsite disposal activities are provided as Exhibit G*
e. *There has been no sampling of the liquid or sediment in the stormwater retention pond by SSI in the past five years, therefore, no records of monitoring or water/sediment analyses are available. However, on September 11, 2013, CPS did sample the pond water at the behest of SSI. The sample collected was sampled for total mercury. The results are attached in Exhibit H.*
f. *Waste oil, motor oil, antifreeze, hydraulic fluid and used oil filters are stored in a 850 gallon secondary containment area. Details of spill prevention will be available in the Spill Prevention, Control and Countermeasure plan which is being prepared by CPS. Based on discussions with facility operators, spills at the facility have been limited to the occasional hydraulic oil spills from leaks that may develop in a shear or crane's hydraulic line. Hydraulic lines on the Harris shear in the shear house are visually inspected every 30 minutes . When a hydraulic leak does occur, operations are shutdown immediately to minimize the loss of fluid and the leak is treated with absorbent material. Leaks from the crane hydraulic lines spray over the scrap metal on the site and are unrecoverable.*

11. Regarding the depression in the ground mentioned in paragraph 9 of this section and the stormwater pond, please respond to the following:

a. List all industrial materials, including hazardous materials, on-site which have the potential to come into contact with stormwater. Identify where such materials are stored, especially near the stormwater pond and the depression described in Paragraph 9 above.
b. What steps are taken to prevent the migration of any materials associated with industrial activities, including hazardous materials, into the depression and stormwater pond?

Response:

a. *There are two 500 gallon, double walled tanks, of off-road diesel fuel. One is located by the scale house and the other one is near the north end gate. Motor oil and anti-freeze are stored in 5 5 gallon drums located in the containment area outside of the office at the south east corner of the site. There are also two 275 capacity used oil tanks located in the containmen t area, as well as, a 500 gallon hydraulic fluid tank. There are three cranes each containing 55 gallons of hydraulic fluid. There are 4 small alligator shears each containing 10 gallons of hydraulic fluid. There are sealed car batteries containing acid that are palletized and shrink wrapped staged at the south end of the site.*
b. *The used oil tanks, motor oil drums, anti-freeze drums and used oil filters are located in a n 850 gallon capacity secondary containment area to prevent migration to the depression area/pond. This material is periodically removed for disposal.*

12. Does the Facility currently use an oil/water separator as one of its BMPs? If yes, identify the location of the oil/water separator. If no, has the Facility ever used an oil/water separator? If the Facility has previously used an oil-water separator on-site, but does currently use an oil-water separator, provide the location of the oil/water separator, the date that it was taken out of service and an explanation of why it was taken out of service.

Response: The facility does not currently use an oil/water separator nor has the facility used an oil/water separator in the past.

13. Has the Facility ever sampled any stormwater run-off from the site?

Response: Stormwater run-off was sampled in the 1990's before the berm in the asphalt was installed in 2000. Since construction of the berm to contain stormwater onsite, sampling of stormwater run-off has been discontinued due to the fact that stormwater from the active portion of the facility is not intended to leave the site.

14. Identify all oil storage containers (e.g., 55 gallon drums, tanks, dumpsters, etc.) at the Facility, including the size of containers in which the oil is stored.

Response: The following chart documents the oil storage containers, their locations and storage capacities:

Material	*Quantity*	*Capacity*	*Location*
Off road diesel fuel	*1*	*500 gallon tank*	*West of the shear house*
Off road diesel fuel	*1*	*500 gallon tank*	*Near the northeast entrance*
Motor Oil	*1*	*55gallon drum*	*Containment area*
Anti-Freeze	*1*	*55 gallon drum*	*Containment area*
Used oil	*2*	*275 gallon tank*	*Containment area*
Hydraulic Fluid	*1*	*3000 gallon tank*	*Shear house*
Automatic Transmission Fluid (ATF)	*multiple*	*Quarts bottles*	*Containment area*
Gear Oil	*multiple*	*5 gallon buckets*	*Warehouse*
Gear Lubricant	*5*	*55 gallon drum*	*Shear house*

15. Identify all oil-filled equipment at the Facility, including the size of the oil-filled equipment storage capacity.

Response: The following chart documents the oil-filled equipment onsite at the facility and their storage capacities:

Equipment	*Quantity*	*Fluid*	*Capacity*
Cranes	*3*	*Hydraulic Fluid*	*55 gal*
Alligator shears	*4*	*Hydraulic Fluid*	*10 gal*
Bobcat	*1*	*Hydraulic, Engine oil*	*20 gal, 5 qt*
Forklift	*2*	*Hydraulic, Engine oil, ATF*	*5gal, 5 qt, 3qt*
Bailer	*1*	*Hydraulic Fluid*	*200 gal*

16. Has a Spill Prevention, Control and Countermeasure (SPCC) Plan ever been developed for the Facility? If so, provide a copy of the SPCC Plan.

Response: Prior to the EPA's multimedia inspection of the facility in May 2013, there was no SPCC plan developed for, or in place at, the facility. However, a plan is being developed by CPS. In the course of development of the SPCC plan an evaluation will be performed to assess the soil conditions, geography and location of the facility relative to nearby navigable waters to determine the applicability of such a plan at the SSI facility. Management practice has been to stop operations when a leak is discovered, stop the source of the leak, and clean up any accumulated oil with oil dry which is put in the drums with the used oil filters for offsite disposal.

17. Provide a log book or other documentation that identifies how much oil is stored in the two above ground oil storage tanks that were at the Facility at the time of the EPA inspection in May 2013.

Response: There is currently no log book that identifies the volume of used oil stored in the above ground tanks. Each tank has a maximum capacity of 275 gallons and the contents are periodically removed for offsite recycling.

Questions Pertaining to the Resource Conservation and Recovery Act:

18. Identify whether the Facility has ever provided dumpsters to specific entities (e.g., small business, government organizations), or to the general public, for the purpose of collecting scrap. For each event, describe what types of scrap were accepted in the dumpsters (i.e., air conditioners, electronics, light ballast, car batteries, car parts, tanks, etc.).

Response: Roll-off services are provided to select contractors only. Since the installation of the current tracking software in July 2012, up to 300 different contractors have been provided 754 boxes. Records of invoices by contractor are on file but not by event. The material collected ranges from light iron to structural steel. SSI does not accept air

conditioners, electronics, light ballast, car batteries, car parts, or tanks in its roll-off container service.

19. Describe the sites owned by Super Salvage that are located in Prince Frederick, Maryland and California, Maryland. Describe the relationship of these two sites to the Super Salvage site in Washington DC. What is the operational relationship between these three facilities (i.e., do they ship materials to each other)?

Response: The Prince Frederick, MD facility includes a large warehouse located on a 6-acre property that is owned by SSI. The California, MD facility includes a small warehouse, an office and a shed located on a 6-acre property that is leased from St Mary Scrap Holdings, LLC by SSI.

Insulated copper wire and aluminum cans are transported to the Prince Frederick facility for processing by equipment that is not currently available at the DC location. Insulated aluminum wire is transported to the California facility for the same reason. The Prince Frederick facility transports #2 mixed steel to DC for processing by the 800 ton Harris shear.

Occasionally material from a combination of two or all three facilities may be combined to complete a truckload of non-ferrous material as requested by customers. The material is placed in large containers called gaylords which are individually weighed at their respective facility before being combined onto a single box trailer for deliver to the customer.

20. Provide the following regarding the Blast Booth located at the Facility:

a. A detailed process description for the Blast Booth.
b. Is this Blast Booth still operational? If not, when was it last operated?
c. How is/was waste generated from the Blast Booth disposed of?
d. Has the waste generated by the Blast Booth been tested to determine whether it is a regulated waste under RCRA? If so, please provide copies of the results of any tests that were performed on the waste.
e. What are the Facility's plans for disposing of any remaining waste?

Response:

a. The Blast Booth was used to remove paint from copper pipe (called #2 copper). The process consisted of tumbling short pieces of pipe while subjected them to air propelled stainless steel shot. The dust and residual paint was collected by the exhaust system and gravity fed into the dust collection drum. The copper recovered from the machine (now called #1 copper) was historically worth more than the original painted #2 copper.
b. The Blast Booth is no longer operational. The operational cost of the machine exceeded the additional value of the #1 copper produced by the process. It was in service and used periodically from April 2007 through mid-2011.

c. *The waste currently present in the collection drum is estimated to be less than 100 lbs and is the total material collected during the entire service life of the machine. It has never been disposed of.*
d. *Prior to the inspection by the EPA in May 2013 the waste has never been tested to determine its waste classification, therefore no records of analyses are available.*
e. *The waste will be analyzed and disposed of in accordance with applicable Federal, State and local regulations.*

21. Has the Facility made a determination of its status for the generation of waste – e.g. small or large quantity generator or conditionally exempt small quantity generator? If so, provide all documents and test results relied upon to make that determination.

Response: SSI is registered as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste under the District Department of the Environment (DDOE), Hazardous Waste Program guidelines. This was based on the facility's *knowledge of its waste and waste generation practices. SSI, produces less than 220 pounds of hazardous waste in a calendar month and accumulates onsite less than 2200 pounds of hazardous waste at any one time prior to disposal. Annual Self-Certification of Compliance forms completed for the DDOE are attached as Exhibit I.*

22. Identify the following regarding oil/used oil/waste oil at the Facility:

a. What constitutes oil/used oil/waste oil at the Facility?
b. What equipment or processes generate oil/used oil/waste oil?
c. How is oil/used oil/waste oil move around in the Facility?
d. How does the Facility dispose of the oil/used oil/waste oil?

Response:

a. *Virgin oil is purchased to be used in the facility equipment. The oil is then considered used/waste oil when it is removed from a machine during servicing/maintenance.*
b. *The following equipment generate used oil/waste oil: two Liebherr cranes, a Fuchs crane, a Bobcat, and two Forklifts.*
c. *New oil is removed from 55 gallon drums into 1 gallon containers to be added to each machine. Used oil is drained from the machines using a container specially* designed for the machines' crank cases and then poured into the waste oil tank.
d. *The waste oil is removed by various used oil recyclers who pump out the waste oil tanks onto a tanker truck and take it offsite for recycling.*

23. For all waste leaving the Facility, provide all records that support waste determinations (i.e., whether the waste is a regulated hazardous waste), including inventories, manifests, bills of lading, and any other documentation of receipts describing the waste.

Response: As a CESQG as defined under 40 CFR 261.5, the facility is not subject to any specific record keeping requirements and no records for waste determination could be

located. There are, however, receipts available from disposal vendors for the used oil and used oil filters, as well as, stormwater retention pond skimming. These documents are being provided as Exhibit J.

24. Has the Facility ever made a Waste Determination regarding other types of waste products (i.e., aerosol cans, drums with waste stored in them, paint cans, gas cylinders, etc.)?

Response: The facility does not generate any regulated hazardous wastes other than waste oil. Gas cylinders are returned, refilled or exchanged when empty and are not disposed of as waste. Waste aerosol and paint cans are not generated in quantities that are reportable as defined by the CESQG guidelines.

25. Has the Facility ever removed any oil-contaminated soil from the site? If yes, provide records that describe the date, amount of soil removed, and any relevant sample lab analysis.

Response: The facility has no records or knowledge of any oil-contaminated soil being removed from the site.

Questions Pertaining to the Clean Air Act (CAA):

26. Does the Facility engage in any burning activities on-site? If so, provide a specific description of the burning activity that occurs, and explain what steps are taken to control/minimize the emissions from the burning activity.

Response: The facility utilizes two 55 gallon steel drums to burn the wood from broken pallets. Pallets are obtained from a neighboring building supply. The facility also uses propane torches to cut metal by permit from DC. There are no emission controls in place for either activity.

Questions Pertaining to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA):

27. Have any hazardous substances, as that term is defined in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), ever been disposed of in the stormwater pond?

Response: Other than periodic spills or discharges of oil petroleum substances as referenced elsewhere in this response, no hazardous substances defined by the regulations noted above are known to have ever been deliberately or accidentally disposed of in the stormwater retention pond. The sole purpose of the stormwater retention pond is for the collection of stormwater.

28. Has there ever been a release of a hazardous substance anywhere else at the Facility?

Response: Other than periodic releases of petroleum products as referenced elsewhere in this response, there is no knowledge of any reportable release of a hazardous substance at the facility.

N:\#0326 - Super Salvage, Inc\Responses to Q4-28 of August 29, 2013 EPA Information Request.docx